

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

December 16, 2014

MEMORANDUM

Subject: Similarity Clinic for EPA File Symbol: 4822-ANI  
Product Name: Gurney  
DP Barcode: D421963  
PC Code: 128929  
EPA Reg. No. Cited: 4822-592

From: Chris Jiang, Chemist  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

A handwritten signature in black ink that reads "Chris Jiang".

Through: Karen Hicks, Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

A handwritten note in blue ink that reads "Juan Negron for K.P.H. 12/23/14".

To: Julie Chao PM 34/Terria Northern  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

FORMULATION FROM LABEL:

|                                   | <u>% by wt.</u> |
|-----------------------------------|-----------------|
| <u>Active Ingredient(s):</u>      |                 |
| Lactic acid.....                  | 1.77            |
| <u>Inert Ingredient(s):</u> ..... | 98.23           |
| Total                             | 100.00%         |

## BACKGROUND:

S. C. Johnson & Son Inc. has submitted a package to request to use the acute toxicity from 4822-592 to cover the acute toxicity of 4822-ANI. The package includes a cover letter, a label, Confidential Statements of Formula (CSFs) for the basic formulation and four alternate formulations, a CSF for the basic formulation of the cited product, and a review of the acute toxicity for the cited product.

## RECOMMENDATIONS:

- The proposed product is substantially similar to 4822-592 so the acute toxicity can be cited to support this product. The precautionary statements and the first aid statements are **acceptable**, but the label must be changed to read L-Lactic acid.

The acute toxicity profile for EPA Reg. No. 4822-ANI is currently:

|                    |                |          |
|--------------------|----------------|----------|
| Acute Oral         | IV             | 48809703 |
| Acute Dermal       | IV             | 48809704 |
| Acute Inhalation   | IV             | 48800705 |
| Primary Eye        | III            | 48809706 |
| Primary Dermal     | IV             | 48809707 |
| Skin sensitization | non sensitizer | 48809708 |